

**U.S. District Court**  
**District of Columbia (Washington, DC)**  
**CIVIL DOCKET FOR CASE #: 1:18-cv-02591-ABJ**

TRENT v. UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY  
Assigned to: Judge Amy Berman Jackson  
Cause: 05:552 Freedom of Information Act

Date Filed: 11/09/2018  
Jury Demand: None  
Nature of Suit: 895 Freedom of  
Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**MATHIAS TRENT**  
*formerly known as*  
BINH QUOC TRAN

represented by **Kevin E. Byrnes**  
FHH, PLLC  
1751 Pinnacle Drive  
Suite 1000  
McLean, VA 22102  
(703) 590-1234  
Fax: (703) 590-0366  
Email: [Kbyrnes@fhhfirm.com](mailto:Kbyrnes@fhhfirm.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY**

represented by **Daniel Patrick Schaefer**  
U.S. ATTORNEY'S OFFICE FOR THE  
DISTRICT OF COLUMBIA  
555 Fourth Street, NW  
Washington, DC 20530  
(202) 252-2531  
Fax: (202) 252-2599  
Email: [Daniel.Schaefer@usdoj.gov](mailto:Daniel.Schaefer@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
11/09/2018	<u>1</u>	COMPLAINT against UNITED STATES DEPARTMENT OF HOMELAND SECURITY ( Filing fee \$ 400 receipt number 0090-5786414) filed by MATHIAS TRENT. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Civil Cover Sheet, # <u>6</u> Summons, # <u>7</u> Summons)(Byrnes, Kevin) (Attachment 5 – Civil Cover Sheet replaced on 11/13/2018) (zjd). (Entered: 11/09/2018)
11/13/2018		Case Assigned to Judge Amy Berman Jackson. (zjd) (Entered: 11/13/2018)
11/13/2018	<u>2</u>	SUMMONS (2) Issued Electronically as to UNITED STATES DEPARTMENT OF HOMELAND SECURITY and U.S. Attorney General. SUMMONS NOT ISSUED as to U.S. Attorney for the District of Columbia. (Attachments: # <u>1</u> Notice and Consent)(zjd) (Entered: 11/13/2018)
11/26/2018	<u>3</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General November 15, 2018. (Byrnes, Kevin) (Entered: 11/26/2018)
11/26/2018	<u>4</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES DEPARTMENT OF HOMELAND SECURITY served on 11/15/2018 (Byrnes, Kevin) (Entered: 11/26/2018)
01/23/2019	<u>5</u>	ENTERED IN ERROR.....REQUEST FOR SUMMONS TO ISSUE <i>as to U.S. Attorney for the District of Columbia</i> filed by MATHIAS TRENT.(Byrnes, Kevin) Modified on 1/23/2019 (jf). (Entered: 01/23/2019)

01/23/2019		NOTICE OF CORRECTED DOCKET ENTRY: Document No. re <u>5</u> Request for Summons to Issue was entered in error and counsel was instructed to refile said pleading using the FOIA Summons.(jf) (Entered: 01/23/2019)
01/28/2019	<u>6</u>	REQUEST FOR SUMMONS TO ISSUE filed by MATHIAS TRENT.(Byrnes, Kevin) (Entered: 01/28/2019)
01/28/2019	<u>7</u>	SUMMONS (3) Issued Electronically as to UNITED STATES DEPARTMENT OF HOMELAND SECURITY, U.S. Attorney and U.S. Attorney General (jf) (Entered: 01/28/2019)
02/12/2019	<u>8</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. MATHIAS TRENT served on 1/29/2019, RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 01/29/2019., RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 1/29/2019. ( Answer due for ALL FEDERAL DEFENDANTS by 2/28/2019.) (Byrnes, Kevin) Modified on 2/12/2019 to correct service/answer due date (jf). (Entered: 02/12/2019)
02/28/2019	<u>9</u>	NOTICE of Appearance by Daniel Patrick Schaefer on behalf of UNITED STATES DEPARTMENT OF HOMELAND SECURITY (Schaefer, Daniel) (Entered: 02/28/2019)
02/28/2019	<u>10</u>	ANSWER to Complaint by UNITED STATES DEPARTMENT OF HOMELAND SECURITY.(Schaefer, Daniel) (Entered: 02/28/2019)
03/01/2019		NOTICE OF ERROR re <u>10</u> Answer to Complaint; emailed to Daniel.Schaefer@usdoj.gov, cc'd 4 associated attorneys -- The PDF file you docketed contained errors: 1. Incorrect header/caption/case number, 2. DO NOT REFILE -- Judge's initials are ABJ, please make corrections for future filings (zjf, ) (Entered: 03/01/2019)
03/01/2019	<u>11</u>	ORDER. Before the Court in this FOIA case are a complaint and an answer. The requirements of Local Civil Rule 16.3 and Rule 26(f) of the Federal Rules of Civil Procedure appear to be inapplicable. Defendant shall file a dispositive motion or, in the alternative, a report setting forth the schedule for the completion of its production of documents to plaintiff, on or before March 29, 2019. SO ORDERED. Signed by Judge Amy Berman Jackson on 3/1/2019. (lcabj2) (Entered: 03/01/2019)
03/29/2019	<u>12</u>	Joint STATUS REPORT <i>and Proposed Schedule</i> by UNITED STATES DEPARTMENT OF HOMELAND SECURITY. (Attachments: # <u>1</u> Text of Proposed Order)(Schaefer, Daniel) (Entered: 03/29/2019)
04/02/2019		MINUTE ORDER. Defendant must produce a draft Vaughn index and search summary to plaintiff by April 12, 2019, and the parties must file another joint status report by May 3, 2019. SO ORDERED. Signed by Judge Amy Berman Jackson on 4/2/2019. (lcabj2) (Entered: 04/02/2019)
05/03/2019	<u>13</u>	Joint STATUS REPORT by MATHIAS TRENT. (Attachments: # <u>1</u> Text of Proposed Order)(Byrnes, Kevin) (Entered: 05/03/2019)
05/07/2019		MINUTE ORDER. The parties must file another status report by June 3, 2019, which may include a proposed schedule for the filing of dispositive motions if the parties have not resolved their differences. Any consideration of the need for in camera review or the imposition of sanctions would be premature at this time. SO ORDERED. Signed by Judge Amy Berman Jackson on 5/7/2019. (lcabj2) (Entered: 05/07/2019)
06/03/2019	<u>14</u>	Joint STATUS REPORT by MATHIAS TRENT. (Attachments: # <u>1</u> Text of Proposed Order, # <u>2</u> Exhibit)(Byrnes, Kevin) (Entered: 06/03/2019)
06/06/2019		MINUTE ORDER. Defendant must file a dispositive motion by July 2, 2019; plaintiff must file a response to defendant's dispositive motion by July 16, 2019; and defendant must reply by July 31, 2019. SO ORDERED. Signed by Judge Amy Berman Jackson on 6/6/2019. (lcabj2) (Entered: 06/06/2019)
07/02/2019	<u>15</u>	MOTION for Summary Judgment by UNITED STATES DEPARTMENT OF HOMELAND SECURITY (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Statement of Facts, # <u>3</u> Exhibit 1, # <u>4</u> Exhibit 2, # <u>5</u> Text of Proposed Order)(Schaefer, Daniel)

		(Entered: 07/02/2019)
07/09/2019	<u>16</u>	Unopposed MOTION for Extension of Time to File Response/Reply as to <u>15</u> MOTION for Summary Judgment by MATHIAS TRENT (Attachments: # <u>1</u> Text of Proposed Order)(Byrnes, Kevin) (Entered: 07/09/2019)
07/09/2019		MINUTE ORDER granting <u>16</u> Motion for Extension of Time. Plaintiff must file his opposition to defendant's motion for summary judgment <u>15</u> by August 13, 2019. Defendant must file its reply by August 29, 2019. SO ORDERED. Signed by Judge Amy Berman Jackson on 7/9/2019. (lcabj2) (Entered: 07/09/2019)
08/13/2019	<u>17</u>	RESPONSE re <u>15</u> MOTION for Summary Judgment filed by MATHIAS TRENT. (Attachments: # <u>1</u> Memorandum in Support of Opposition to MSJ, # <u>2</u> Exhibit A and B)(Byrnes, Kevin) (Entered: 08/13/2019)
08/28/2019	<u>18</u>	Consent MOTION for Extension of Time to File Response/Reply as to <u>15</u> MOTION for Summary Judgment by UNITED STATES DEPARTMENT OF HOMELAND SECURITY (Attachments: # <u>1</u> Text of Proposed Order)(Schaefer, Daniel) (Entered: 08/28/2019)
08/29/2019		MINUTE ORDER granting <u>18</u> Motion for Extension of Time. Defendant must file its reply in support of its motion for summary judgment by September 5, 2019. SO ORDERED. Signed by Judge Amy Berman Jackson on 8/29/2019. (lcabj2) (Entered: 08/29/2019)
09/05/2019	<u>19</u>	REPLY to opposition to motion re <u>15</u> MOTION for Summary Judgment filed by UNITED STATES DEPARTMENT OF HOMELAND SECURITY. (Schaefer, Daniel) (Entered: 09/05/2019)
09/26/2019	<u>20</u>	MOTION for Leave to File <i>Surreply to Correct Misstatements and Distortions</i> by MATHIAS TRENT (Byrnes, Kevin) (Entered: 09/26/2019)
09/26/2019	<u>21</u>	MEMORANDUM re <u>20</u> MOTION for Leave to File <i>Surreply to Correct Misstatements and Distortions</i> filed by MATHIAS TRENT by MATHIAS TRENT. (Byrnes, Kevin) (Entered: 09/26/2019)
09/30/2019		MINUTE ORDER granting <u>20</u> Motion for Leave to File Sur-Reply. The Clerk of Court is directed to docket <u>21</u> as plaintiff's Sur-Reply. SO ORDERED. Signed by Judge Amy Berman Jackson on 9/30/2019. (lcabj2) (Entered: 09/30/2019)